

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

TINA EASLEY and CAROLINE
EASLEY,

Plaintiffs,

vs.

WORLDWIDE RECOVERIES, LLC

and

DANIEL SCHIELE a.k.a. DAN
DURBIN,

a.k.a. DAN DURBINSCHIELE

and

CHRIS MEYERS

and

JOHN DOES 1-10,

Defendants.

CIVIL ACTION NO. 10-CV-3922(TON)

INTERROGATORIES TO GARNISHEE

TO: Bank of America
Four Penn Center
1600 JFK Boulevard
Philadelphia, PA 19103

You are required to file answers to the following interrogatories within twenty (20) days after service upon you. Failure to do so may result in judgment against you:

1. At the time you were served or at any subsequent time did you owe Worldwide Recoveries, LLC ("Defendant") any money or were you liable to Worldwide Recoveries, LLC on any negotiable or other written instrument, or did Worldwide Recoveries, LLC claim that you owed them any money or were liable to Worldwide Recoveries, LLC for any reasons?
2. At the time you were served or at any subsequent time was there in your possession, custody or control or in the joint possession, custody or control or in the joint possession, custody or control of yourself and one or more other persons any property of any nature owned solely or in part by Worldwide Recoveries, LLC?

3. At the time you were served or at any subsequent time did you hold legal title to any property of any nature owned solely or in part by Worldwide Recoveries, LLC or in which Worldwide Recoveries, LLC held or claimed any interest?
4. At the time you were served or at any subsequent time did you hold as fiduciary any property in which Worldwide Recoveries, LLC had an interest?
5. At any time before or after you were served did Worldwide Recoveries, LLC transfer or deliver any property to you or to any person or place pursuant to your direction or consent and if so, what was the consideration thereof?
6. At any time after you were served did you pay, transfer or deliver any money or property to Worldwide Recoveries, LLC or to any person or place pursuant to Worldwide Recoveries, LLC's direction or otherwise discharge any claim of Worldwide Recoveries, LLC against you?
7. If you are a bank or other financial institution, at the time you were served or at any subsequent time did Worldwide Recoveries, LLC have funds on deposit in any account in which funds are deposited electronically on a recurring basis and which are identified as being funds that upon deposit are exempt from execution, levy or attachment under Pennsylvania or federal law? If so, identify each account and state the reason for the exemption, the amount being withheld under each exemption and the entity electronically depositing those funds on a recurring basis.
8. If you are a bank or other financial institution, at the time you were served or at any subsequent time did Worldwide Recoveries, LLC have funds on deposit in an account in which the funds on deposit, not including any otherwise exempt funds, did not exceed the

amount of the general monetary exemption under 42 Pa. C.S. § 8123? If so, identify each account.

9. If your answer to any of the above questions is “yes” set forth the nature of the property, the amount, how held, and the location of same.

LUNDY, FLITTER, BELDECOS & BERGER, P.C.

By: _____

ANDREW M. MILZ, ESQUIRE
Attorney for Plaintiffs

Dated: _____

3/3/11